

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

JEFF MOORE, ELIZABETH BROOKE MOORE,
and VIDAL TORRES on behalf of themselves and all
others similarly situated,

Plaintiffs,

V.

YELLOW CORPORATION, et al.,

Defendants.

WILLIAM G. COUGHLIN, et al.,

Plaintiffs,

V.

YELLOW CORPORATION, et al.

Defendants.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Re: Docket Nos. 5523, 5448

Adv. Pro. No. 23-50457 (CTG)

Re: Docket Nos. 208, 214

Adv. Pro. No. 23-50761 (CTG)

Re: Docket Nos. 163, 169

SECOND AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED ON
JANUARY 21, 2025 AT 9:30 A.M. (PREVAILING EASTERN TIME) BEFORE THE
HONORABLE CRAIG T. GOLDBLATT AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET
STREET, 3rd FLOOR, COURTROOM NO. 7,³ WILMINGTON, DELAWARE 19801

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Amended items are in bold.

³ Please note, the hearing location has been changed to the 3rd Floor, Courtroom No. 7.

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures <https://www.deb.uscourts.gov/judge-craig-t-goldblatt> and the Court's website <https://www.deb.uscourts.gov/ecourt-appearances> for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

RESOLVED MATTERS:

1. Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4431](#))

Response Deadline: October 10, 2024, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4431](#), [Exhibit A](#))
- B. Notice of Submission of Proof of Claim in Connection with Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/11/24] ([Docket No. 4535](#))
- C. [Signed] Order Sustaining Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/25/24] ([Docket No. 4681](#))
- D. Notice of Withdrawal, Without Prejudice, of Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1, Solely With Respect to Claim No. 19205 Filed By Kings Fleet Service, NW, LLC [Filed: 11/13/24] ([Docket No. 4854](#))
- E. Certification of Counsel Regarding Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b),

Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/13/24] ([Docket No. 5160](#))

- F. [Signed] Order Sustaining Debtors' Eighteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/16/24] ([Docket No. 5183](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

2. Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4433](#))

Response Deadline: October 10, 2024, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4433](#), [Exhibit A](#))
- B. Notice of Submission of Proof of Claim in Connection with Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/11/24] ([Docket No. 4537](#))
- C. [Signed] Order Sustaining Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/25/24] ([Docket No. 4683](#))
- D. Notice of Withdrawal, Without Prejudice, of Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1, Solely With Respect to Claim No. 14452 Filed By Julie Scheer [Filed: 11/13/24] ([Docket No. 4855](#))
- E. Certification of Counsel Regarding Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/13/24] ([Docket No. 5161](#))
- F. [Signed] Order Sustaining Debtors' Twentieth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/16/24] ([Docket No. 5184](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

3. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Motion for Partial Summary Judgment on SFA MEPPs' and NON-SFA MEPPs' Claims [Filed: 12/18/24] ([Docket No. 5219](#))

Response Deadline: January 2, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Authorizing Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Motion for Partial Summary Judgment on SFA MEPPs' and NON-SFA MEPPs' Claims [Filed: 12/18/24] ([Docket No. 5219, Exhibit A](#))
- B. Certification of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Motion for Partial Summary Judgment on SFA MEPPs' and NON-SFA MEPPs' Claims [Filed: 1/3/25] ([Docket No. 5329](#))
- C. [Signed] Order Authorizing Debtors' to File Under Seal Certain Portions of Debtors' Motion for Partial Summary Judgment on SFA MEPPs' and NON-SFA MEPPs' Claims [Filed: 1/7/25] ([Docket No. 5348](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

CONTINUED MATTERS:

4. Debtors' Seventeenth Omnibus (Non- Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 7/15/24] ([Docket No. 3895](#))

Response Deadline: July 29, 2024, at 4:00 p.m. (ET) (*extended until July 31, 2024 for Audacy Operations, Inc.*)

Responses Received:

- A. Creditor Curtis Reed's Response to Seventeenth Omnibus (Non- Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 7/29/24] ([Docket No. 3995](#))
- B. Response of James C. Alexander and Lisa Alexander to the Debtors' Seventeenth (17th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rule 3003 and 3007, and Local Rule 3007-1 [Filed: 7/29/24] ([Docket No. 3996](#))

- C. Response of Frank Young to Debtors' Seventeenth Omnibus (Non-Substantive) Objection to Claims and Request to Not Bar Late Filed Claim [Filed: 7/29/24] ([Docket No. 3999](#))
- D. Claimant Matthew Viriyapanthu's Response to Debtors' Seventeenth Omnibus (Non-Substantive) Objection to Claim [Filed: 7/30/24] ([Docket No. 4001](#))
- E. Objection to the Entry of the Relief Order to Disallow a Lat Filed Claim [Filed by Claimant Sands Cooper] [Filed: 7/29/24] ([Docket No. 4002](#))
- F. Allied Logistics' Response to Debtors' Seventeenth Omnibus (Non-Substantive) Objection to Claims [Filed: 8/2/24] ([Docket No. 4027](#))
- G. Claimants Objection for Dismissal of Claim Do to Being Filed After General Bar Date of Chapter 11 [Bradley's Truck Service, Inc.] [Filed: TBD] (Docket No. TBD)
- H. Claimant's Opposition to the Bar of Claimant's Claim Due to Late Filing [Kenneth Rodriquez] [Filed: TBD] (Docket No. TBD)
- I. Response of Airframe Spa Covers to Debtors' Seventeenth (17th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rule 3003 and 3007, and Local Rule 3007-1 [Filed: TBD] (Docket No. TBD)
- J. Informal Response of Audacy Operations, Inc.
- K. Informal Response of Master-Bilt Products, LLC/Nor-Lake Inc.
- L. Response to Late Filed Claims [Filed by Willie Robinson] [Filed: 10/25/24] ([Docket No. 4677](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Seventeenth Omnibus (Non- Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 7/15/24] ([Docket No. 3895, Exhibit A](#))
- B. Notice of Submission of Proofs of Claim in Connection with Debtors' Seventeenth Omnibus (Non- Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 8/1/24] ([Docket No. 4021](#))
- C. Certification of Counsel Regarding Debtors' Seventeenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 8/14/24] ([Docket No. 4091](#))

- D. [Signed] Order Sustaining Debtors' Seventeenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) and 503(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 8/16/24] ([Docket No. 4106](#))

Status: This matter is continued to the omnibus hearing on February 11, 2025 at 10:00 a.m. (ET) with respect to the claim of Allied Logistics [Claim No. 5629].

5. Motion of Jill Napiwocki for Relief From the Automatic Stay to the Extent of Liability Insurance [Filed: 11/8/23] ([Docket No. 1062](#))

Response Deadline: November 22, 2023 at 4:00 p.m. (*extended until December 9, 2024, at 4:00 p.m. (ET)*)

Responses Received:

- A. Debtors' Amended and Restated Omnibus Objection to Personal Injury Claimant Motions for Relief from the Automatic Stay Under Section 362 of the Bankruptcy Code [Filed: 12/6/23] ([Docket No. 1273](#))
- B. Debtors' Second Amended and Restated Omnibus Objection to Personal Injury Claimant Motions for Relief From the Automatic Stay Under Section 362 of the Bankruptcy Code [Filed: 1/11/23] ([Docket No. 1730](#))

Related Documents:

- A. [Proposed] Order Granting Phillip B. Deterding's Motion for Relief from the Automatic Stay [Filed: 11/8/23] ([Docket No. 1062, Exhibit A](#))
- B. Re-Notice of Motion of Jill Napiwocki for Relief From the Automatic Stay to the Extent of Liability Insurance [Filed: 10/21/23] ([Docket No. 4596](#))

Status: This matter is continued to a further date to be determined.

6. Motion of James Curry for Relief From the Automatic Stay to the Extent of Liability Insurance Proceeds [Filed: 2/22/24] ([Docket No. 2342](#))

Response Deadline: November 8, 2024, at 4:00 p.m. (ET) (*extended until December 9, 2024, at 4:00 p.m. (ET)*)

Responses Received:

- A. Debtors' Fourth Amended and Restated Omnibus Objection to Litigation Claimant Motions for Relief from the Automatic Stay Under Section 362 of the Bankruptcy Code [Filed: 3/13/24] ([Docket No. 2589](#))

Related Documents:

- A. [Proposed] Order Granting Motion of James Curry for Relief From the Automatic Stay to the Extent of Liability Insurance Proceeds [Filed: 2/22/24] ([Docket No. 2342](#))
- B. Re-Notice of Motion of James Curry for Relief From the Automatic Stay to the Extent of Liability Insurance Proceeds [Filed: 10/29/24] ([Docket No. 4717](#))

Status: This matter is continued to a further date to be determined.

UNCONTESTED MATTERS FOR WHICH A COC/CNO HAS BEEN FILED:

- 7. Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4432](#))

Response Deadline: October 10, 2024, at 4:00 p.m. (ET)

Responses Received:

- A. City Wide Franchise Company, Inc.'s Response to Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/17/24] ([Docket No. 4575](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 9/26/24] ([Docket No. 4432, Exhibit A](#))
- B. Notice of Submission of Proof of Claim in Connection with Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/11/24] ([Docket No. 4536](#))
- C. [Signed] Order Sustaining Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 10/25/24] ([Docket No. 4682](#))
- D. Certification of Counsel Regarding Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/15/25] ([Docket No. 5416](#))

- E. [Signed] Order Sustaining Debtors' Nineteenth Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/16/25] ([Docket No. 5428](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

8. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Opposition to Non-SFA MEPPs' Motion for Partial Summary Judgment [Filed: 12/3/24] ([Docket No. 5069](#))

Response Deadline: December 17, 2024, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Opposition to Non-SFA MEPPs' Motion for Partial Summary Judgment [Filed: 12/3/24] ([Docket No. 5069](#), [Exhibit A](#))
- B. Certification of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Opposition to Non-SFA MEPPs' Motion for Partial Summary Judgment [Filed: 1/15/25] ([Docket No. 5409](#))
- C. [Signed] Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Opposition to Non-SFA MEPPs' Motion for Partial Summary Judgment [Filed: 1/16/25] ([Docket No. 5426](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

9. Debtors' Twenty-Third Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/20/24] ([Docket No. 5234](#))

Response Deadline: January 3, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Third Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 12/20/24] ([Docket No. 5234](#), [Exhibit A](#))

- B. Notice of Submission of Proofs of Claim in Connection With Debtors' Twenty-Third Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/7/25] ([Docket No. 5346](#))
- C. Certification of No Objection Regarding Debtors' Twenty-Third Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/15/25] ([Docket No. 5415](#))
- D. [Signed] Order Sustaining Debtors' Twenty-Third Omnibus (Non-Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/16/25] ([Docket No. 5427](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

MATTERS GOING FORWARD:

- 10. Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 11/21/24] ([Docket No. 5018](#))

Response Deadline: December 5, 2024, at 4:00 p.m. (ET) (*extended for the Committee to January 20, 2025*).

Reply Deadline: January 15, 2025, at 4:00 p.m. (ET)

Replies Received:

- A. Debtors' Reply in Support of Its Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code [Filed: 1/15/25] ([Docket No. 5412](#))

Responses Received:

- A. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee's Response to Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim [Filed: 12/3/24] ([Docket No. 5065](#))
- B. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee's Amended Response to Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim [Filed: 12/5/24] ([Docket No. 5085](#))
- C. **Joinder of the Official Committee of Unsecured Creditors to Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims [Filed: 1/20/25] ([Docket No. 5451](#))**

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim for Cares Act Liability [Filed: 11/21/25] ([Docket No. 5018, Exhibit A](#))
- B. Notice of Submission of Proof of Claim in Connection with Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/7/25] ([Docket No. 5345](#))

Status: The parties have agreed to adjourn this matter to the hearing on January 30, 2025 at 10:00 a.m. (ET).

- 11. Motion of Omni Logistics, LLC for Allowance and Payment of Expense of Administration [Filed: 12/4/24] ([Docket No. 5072](#))

Response Deadline: December 18, 2024, at 4:00 p.m. (ET) (*extended for the Debtors until January 17, 2025, at 4:00 p.m. (ET)*)

Responses Received: None.

Related Documents:

- A. [Proposed] Order Granting Motion of Omni Logistics, LLC for Allowance and Payment of Expense of Administration [Filed: 12/4/24] ([Docket No. 5072, Exhibit A](#))

Status: This matter is resolving pending execution of final documentation.

STATUS CONFERENCE:

- 12. Motion of the Pension Benefit Guaranty Corporation for Allowance and Payment of Premiums as Administrative Expense [Filed: 12/9/24] ([Docket No. 5096](#))

Response Deadline: December 23, 2024, at 4:00 p.m. (ET)

Responses Received:

- A. Debtors' Objection to Motion of the Pension Benefit Guaranty Corporation for Allowance and Payment of Premiums as Administrative Expense [Filed: 12/23/24] ([Docket No. 5269](#))

Reply Deadline: January 15, 2025, at 4:00 p.m. (ET)

Replies Received:

- A. Reply of the Pension Benefit Guaranty Corporation in Support of Motion for Allowance and Payment of Premiums as Administrative Expense [Filed: 1/15/25] ([Docket No. 5410](#))

Related Documents:

- A. [Proposed] Order Granting Motion of Omni Logistics, LLC for Allowance and Payment of Expense of Administration [Filed: 12/9/24] ([Docket No. 5096](#), [Exhibit A](#))

Status: This matter will go forward as a status and scheduling conference.

- 13. Debtors' Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America, Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration [Claim Nos. 19438 and 19439] [Filed: 12/20/24] ([Docket No. 5237](#))

Response Deadline: January 3, 2025, at 4:00 p.m. (ET)

Responses Received:

- A. Joinder of the Official Committee of Unsecured Creditors to Debtors' Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America, Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration [Claim Nos. 19438 and 19439] [Filed by the United States of America, Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration] [Filed: 1/3/25] ([Docket No. 5326](#))
- B. Response to Debtors' Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America, Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration [Claim Nos. 19438 and 19439] [Filed: 1/10/25] ([Docket No. 5373](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America, Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce,

National Oceanic and Atmospheric Administration [Claim Nos. 19438 and 19439] [Filed: 12/20/24] ([Docket No. 5237, Exhibit D](#))

Status: This matter will go forward as a status and scheduling conference.

WARN LITIGATION TRIAL:

14. Jeff Moore and Elizabeth Brooke Moore v. Yellow Corporation, et al. – Adv. 23-50457 Class Action Adversary Proceeding Complaint [Filed: 8/10/23] ([Docket No. 1](#))

Response Deadline: November 20, 2023, at 4:00 p.m. (ET)

Responses Received:

- A. Defendants' Answer to Plaintiffs' Class Action Adversary Proceeding Complaint [Filed: 11/9/23] ([Docket No. 11](#))
- B. First Amended Class Action Adversary Proceeding Complaint [Filed: 11/10/23] ([Docket No. 12](#))
- C. Defendants' Answer to Plaintiffs' First Amended Class Action Adversary Proceeding Complaint [Filed: 12/18/23] ([Docket No. 20](#))
- D. Defendants' Answer to Plaintiffs' Second Amended Class Action Adversary Proceeding Complaint [Filed: 1/18/24] ([Docket No. 29](#))

Related Documents:

- A. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Filed: 8/10/23] ([Docket No. 3](#))
- B. Certification of Counsel Submitting Order Approving Stipulation for Extension of Time for Defendants to Answer Complaint [Filed: 9/13/23] ([Docket No. 6](#))
- C. [Signed] Order Approving Stipulation for Extension of Time for Defendants to Answer Complaint [Filed: 9/14/23] ([Docket No. 7](#))
- D. Second Amended Class Action Adversary Proceeding Complaint [Filed: 1/4/24] ([Docket No. 25](#))
- E. [Signed] Order Approving Stipulation Between the Debtors, Official Committee of Unsecured Creditors, and Plaintiffs Permitting Intervention in the Adversary Proceeding [Filed: 5/21/24] ([Docket No. 66](#))
- F. Order Approving Confidentiality Agreement and Stipulated Protective Order [Filed: 5/31/24] ([Docket No. 71](#))
- G. Memorandum Opinion [Filed: 12/19/24] ([Docket No. 180](#))

- H. [Signed] Order Relating to Motions for Summary Judgment Filed in Connection with WARN Claims and Proceedings [Filed: 1/13/25] ([Docket No. 196](#))
- I. Certification of Counsel Submitting the Coughlen Plaintiffs' Contributions to Pretrial Order Relating to WARN Claims and Proceedings [Filed: 1/14/25] ([Docket No. 5403](#)) [Adv. Pro. 23-50761, [Docket No. 159](#)]
- J. [Filed Under Seal] Debtors' WARN Trial Brief [Filed: 1/14/25] (Docket No. 5404) [Adv. Pro. 23-50457, Docket No. 206] [Adv. Pro. 23-50761, Docket No. 160]
- K. International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, and International Association of Machinists and Aerospace Workers' Trial Brief [Filed: 1/14/25] ([Docket No. 5405](#))
- L. [Filed Under Seal] Plaintiffs' Pretrial Brief [Filed: 1/14/25] [Adv. Pro. 23-50457, Docket No. 205]

Status: Trial will go forward on this matter.

15. William G. Coughlen v. Yellow Corporation, et al. – Adv. 23-50761 Class Action Adversary Complaint for (1) Violation of Federal WARN Act 29 U.S.C. § 2101, et seq., (2) Breach of Contract, (3) Unjust Enrichment, (4) Declaratory Relief, (5) Violation of California Labor Code §1400 et. seq., (6) Violation of California Labor Code § 201 et. seq., (7) Violation of North Carolina Wage and Hour Act §§ 95-25.1 et seq., (8) Violation of New York WARN Act, Nyll §860 et. seq., and (9) Violation of New Jersey Millville Dallas Airmotive Plant Job Loss Notification Act [Filed: 11/13/23] ([Docket No. 1](#))

Response Deadline: February 16, 2024, at 4:00 p.m. (ET)

Responses Received:

- A. Defendants' Answer to Plaintiff's Class Action Adversary Proceeding Complaint [Filed: 2/7/24] ([Docket No. 4](#))

Related Documents:

- A. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Filed: 1/17/24] ([Docket No. 3](#))
- B. Memorandum Opinion [Filed: 12/19/24] ([Docket No. 143](#))
- C. [Signed] Order Relating to Motions for Summary Judgment Filed in Connection with WARN Claims and Proceedings [Filed: 1/13/25] ([Docket No. 154](#))
- D. Certification of Counsel Submitting the Coughlen Plaintiffs' Contributions to Pretrial Order Relating to WARN Claims and Proceedings [Filed: 1/14/25] ([Docket No. 5403](#)) [Adv. Pro. 23-50761, [Docket No. 159](#)]

- E. [Filed Under Seal] Debtors' WARN Trial Brief [Filed: 1/14/25] (Docket No. 5404) [Adv. Pro. 23-50457, Docket No. 206] [Adv. Pro. 23-50761, Docket No. 160]

Status: Trial will go forward on this matter.

16. Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2576](#))

Response Deadline: March 26, 2024 at 4:00 p.m.

Responses Received:

- A. State of Wisconsin, Department of Workforce Development's Response to Debtors' Objection to Proofs of Claim for WARN Liability [Filed: 3/25/24] ([Docket No. 2741](#))
- B. Reservation of Rights of Teamsters Local 710 Health & Welfare Fund, Teamsters Local 710 Pension Fund, Central Pennsylvania Teamsters Health & Welfare Fund, and Central Pennsylvania Teamsters Pension Fund to Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2751](#))
- C. Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2755](#))
- D. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee, and The International Association of Machinists and Aerospace Workers' Response to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/28/24] ([Docket No. 2778](#))
- E. Joinder and Reservation of Rights of Teamsters Local 710 to The International Brotherhood of Teamsters Response to Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/29/24] ([Docket No. 2783](#))
- F. Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/29/24] ([Docket No. 2784](#))
- G. WARN Representatives' Response in Opposition to Debtors' Third, Fourth and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (Docs. 2576, 2577 and 2578) [Filed: 4/4/24] ([Docket No. 2836](#))
- H. Response of International Association of Machinists Motor City Health and

Welfare Fund to Debtors' Third Omnibus Claims Objection to Proofs of Claims for WARN Liability Claim Nos. 16914 and 16918 [Filed: 3/29/24] ([Docket No. 2837](#))

- I. Response of International Association of Machinists Motor City Pension Fund to Debtors' Third Omnibus Claims Objection to Proofs of Claims for WARN Liability Claim Nos. 16925 and 16929 [Filed: 4/4/24] ([Docket No. 2838](#))
- J. New York State Teamsters Council Health and Hospital Fund's Limited Response to Debtors' Third Omnibus Objection to Proofs of Claim for WARN Liability [Filed: 4/4/24] ([Docket No. 2839](#))
 - i. Declaration of Kenneth R. Stilwell in Support of the New York State Teamsters Council Health and Hospital Fund's Limited Response to Debtors' Third Omnibus Objection to Proofs of Claim for WARN Liability [Filed: 4/4/24] ([Docket No. 2840](#))
- K. Automobile Mechanics' Local No. 701 Union and Industry Pension Fund and Automobile Mechanics' Local No. 701 Union and Industry Welfare Fund Limited Response to Debtors' Third Omnibus Objection to Proofs of Claim for WARN Liability [Filed: 4/4/24] ([Docket No. 2841](#))
- L. Central States Health Fund's Limited Response to Debtors' Third Omnibus Objection to Proofs of Claim for WARN Liability [Filed: 4/4/24] ([Docket No. 2843](#))
- M. Response of Employment Partners Benefits Fund to Debtors' Third Omnibus Claims Objection to Proofs of Claims for WARN Liability Claim Nos. 16487 and 16253 [Filed: 4/4/24] ([Docket No. 2845](#))
- N. Response of Western Pennsylvania Teamsters and Employers Pension Fund to Debtors' Third Omnibus Claims to Proofs of Claims for WARN Liability Claim Nos. 17750, 17771 and 17789 [Filed: 4/4/24] ([Docket No. 2846](#))
- O. Limited Response of The Mid-Jersey Trucking Industry and Teamsters Local 701 Pension and Annuity Fund and Joinder to the Response of The International Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24] ([Docket No. 2848](#))
- P. Limited Response of the Mid-Jersey Trucking Industry and Teamsters Local 701 Welfare Fund and Joinder to the Response of The International Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24] ([Docket No. 2849](#))
- Q. Response to Debtor's Objection to WARN Act Claims [Filed: 4/8/24] ([Docket No. 2894](#))
- R. Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of

Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/8/24] ([Docket No. 2896](#))

- S. Coughlen WARN Plaintiffs' Response to Statement of The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/9/24] ([Docket No. 2913](#))
- T. Limited Response and Joinder of the Teamsters Local 701 to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2780](#))
- U. Limited Response of the Teamsters Local Union 560 and Joinder to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2781](#))
- V. WARN Representatives' Joinder in Support of Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers To Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (D.I. 2896) [Filed: 4/9/24] ([Docket No. 2923](#))

Replies Received:

- A. Debtors' Reply in Support of Their Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of Claim Alleging WARN Liability [Filed: 4/9/24] ([Docket No. 2909](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2576, Exhibit A](#))
- B. Declaration of Brian Whittman in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2579](#))

- C. Declaration of Cody Leung Kaldenberg in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2580](#))
- D. Declaration of Darren Hawkins in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2581](#))
- E. Declaration of Sarah Statlander in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2582](#))
- F. Memorandum Opinion [Filed: 12/19/24] ([Docket No. 5227](#)) [Adv. Pro. 23-50457, [Docket No. 180](#)] [Adv. Pro. 23-50761, [Docket No. 143](#)]
- G. [Signed] Order Relating to the WARN Claims and Proceedings Pretrial Deadlines [Filed: 12/27/24] ([Docket No. 5280](#)) [Adv. Pro. 23-50457, [Docket No. 183](#)] [Adv. Pro. 23-50761, [Docket No. 145](#)]
- H. [Signed] Order Relating to Motions for Summary Judgment Filed in Connection With Warn Claims and Proceedings [Filed: 1/13/25] ([Docket No. 5390](#)) [Adv. Pro. 23-50457, [Docket No. 196](#)] [Adv. Pro. 23-50761, [Docket No. 154](#)]
- I. Unions' Exhibit List to be Offered at Trial [Filed: 1/13/25] ([Docket No. 5393](#))
- J. Certification of Counsel Submitting the Coughlen Plaintiffs' Contributions to Pretrial Order Relating to WARN Claims and Proceedings [Filed: 1/14/25] ([Docket No. 5403](#)) [Adv. Pro. 23-50761, [Docket No. 159](#)]
- K. [Filed Under Seal] Debtors' WARN Trial Brief [Filed: 1/14/25] (Docket No. 5404) [Adv. Pro. 23-50457, Docket No. 206] [Adv. Pro. 23-50761, Docket No. 160]
- L. International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, and International Association of Machinists and Aerospace Workers' Trial Brief [Filed: 1/14/25] ([Docket No. 5405](#))
- M. [Filed Under Seal] Plaintiffs' Pretrial Brief [Filed: 1/14/25] [Adv. Pro. 23-50457, Docket No. 205]

Status: Trial will go forward on this matter.

- 17. Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2577](#))

Response Deadline: March 26, 2024 at 4:00 p.m.

Responses Received:

- A. Reservation of Rights of Teamsters Local 710 Health & Welfare Fund, Teamsters Local 710 Pension Fund, Central Pennsylvania Teamsters Health & Welfare Fund, and Central Pennsylvania Teamsters Pension Fund to Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2751](#))
- B. Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2755](#))
- C. Response of Roosevelt D. Patterson to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/25/24] ([Docket No. 2758](#))
- D. Response of Christine D. Karluk to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2759](#))
- E. Response of Fedor Kolesnikov to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2760](#))
- F. Response of Milan Vranjes, Jr. to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2761](#))
- G. Response of Robin Whitt to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2762](#))
- H. Response of Sandra Stec to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/28/24] ([Docket No. 2770](#))
- I. Response of Ruben Morsucci to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/28/24] ([Docket No. 2771](#))
- J. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee, and The International Association of Machinists and Aerospace Workers' Response to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/28/24] ([Docket No. 2778](#))
- K. Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/29/24] ([Docket No. 2784](#))

- L. Response of Benjamin Hales to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/25/24] ([Docket No. 2791](#))
- M. Response of Patricia Reisser to Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/25/24] ([Docket No. 2792](#))
- N. WARN Representatives' Response in Opposition to Debtors' Third, Fourth and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (Docs. 2576, 2577 and 2578) [Filed: 4/4/24] ([Docket No. 2836](#))
- O. Limited Response of The Mid-Jersey Trucking Industry and Teamsters Local 701 Pension and Annuity Fund and Joinder to the Response of The International Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24] ([Docket No. 2848](#))
- P. Limited Response of the Mid-Jersey Trucking Industry and Teamsters Local 701 Welfare Fund and Joinder to the Response of The International Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24] ([Docket No. 2849](#))
- Q. Response of James Michael McGuire to Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: TBD] (Docket No. TBD)
- R. Response to Debtor's Objection to WARN Act Claims [Filed: 4/8/24] ([Docket No. 2894](#))
- S. Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/8/24] ([Docket No. 2896](#))
- T. Coughlen WARN Plaintiffs' Response to Statement of The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/9/24] ([Docket No. 2913](#))
- U. Limited Response and Joinder of the Teamsters Local 701 to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2780](#))
- V. Limited Response of the Teamsters Local Union 560 and Joinder to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2781](#))

- W. WARN Representatives' Joinder in Support of Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers To Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (D.I. 2896) [Filed: 4/9/24] ([Docket No. 2923](#))

Replies Received:

- A. Debtors' Reply in Support of Their Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of Claim Alleging WARN Liability [Filed: 4/9/24] ([Docket No. 2909](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Fourth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2577, Exhibit A](#))
- B. Declaration of Brian Whittman in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2579](#))
- C. Declaration of Cody Leung Kaldenberg in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2580](#))
- D. Declaration of Darren Hawkins in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2581](#))
- E. Declaration of Sarah Statlander in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2582](#))
- F. Memorandum Opinion [Filed: 12/19/24] ([Docket No. 5227](#)) [Adv. Pro. 23-50457, [Docket No. 180](#)] [Adv. Pro. 23-50761, [Docket No. 143](#)]
- G. [Signed] Order Relating to the WARN Claims and Proceedings Pretrial Deadlines [Filed: 12/27/24] ([Docket No. 5280](#)) [Adv. Pro. 23-50457, [Docket No. 183](#)] [Adv. Pro. 23-50761, [Docket No. 145](#)]
- H. [Signed] Order Relating to Motions for Summary Judgment Filed in Connection With Warn Claims and Proceedings [Filed: 1/13/25] ([Docket No. 5390](#)) [Adv. Pro. 23-50457, [Docket No. 196](#)] [Adv. Pro. 23-50761, [Docket No. 154](#)]
- I. Unions' Exhibit List to be Offered at Trial [Filed: 1/13/25] ([Docket No. 5393](#))

- J. Certification of Counsel Submitting the Coughlen Plaintiffs' Contributions to Pretrial Order Relating to WARN Claims and Proceedings [Filed: 1/14/25] ([Docket No. 5403](#)) [Adv. Pro. 23-50761, [Docket No. 159](#)]
- K. [Filed Under Seal] Debtors' WARN Trial Brief [Filed: 1/14/25] (Docket No. 5404) [Adv. Pro. 23-50457, Docket No. 206] [Adv. Pro. 23-50761, Docket No. 160]
- L. International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, and International Association of Machinists and Aerospace Workers' Trial Brief [Filed: 1/14/25] ([Docket No. 5405](#))
- M. [Filed Under Seal] Plaintiffs' Pretrial Brief [Filed: 1/14/25] [Adv. Pro. 23-50457, Docket No. 205]

Status: Trial will go forward on this matter.

18. Debtors' Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2578](#))

Response Deadline: March 26, 2024 at 4:00 p.m.

Responses Received:

- A. Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/26/24] ([Docket No. 2755](#))
- B. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee, and The International Association of Machinists and Aerospace Workers' Response to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/28/24] ([Docket No. 2778](#))
- C. Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 3/29/24] ([Docket No. 2784](#))
- D. Response of Donald Way to Debtors' Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 4/1/24] ([Docket No. 2794](#))
- E. WARN Representatives' Response in Opposition to Debtors' Third, Fourth and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (Docs. 2576, 2577 and 2578) [Filed: 4/4/24] ([Docket No. 2836](#))
- F. Limited Response of The Mid-Jersey Trucking Industry and Teamsters Local 701 Pension and Annuity Fund and Joinder to the Response of The International

Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24]
([Docket No. 2848](#))

- G. Limited Response of the Mid-Jersey Trucking Industry and Teamsters Local 701 Welfare Fund and Joinder to the Response of The International Brotherhood of Teamsters and Central States Benefit Funds [Filed: 4/4/24] ([Docket No. 2849](#))
- H. Response of Diana Thompson Regarding Debtors' Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: TBD] (Docket No. TBD)
- I. Response to Debtor's Objection to WARN Act Claims [Filed: 4/8/24] ([Docket No. 2894](#))
- J. Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/8/24] ([Docket No. 2896](#))
- K. Coughlen WARN Plaintiffs' Response to Statement of The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers to Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability [Filed: 4/9/24] ([Docket No. 2913](#))
- L. Limited Response and Joinder of the Teamsters Local 701 to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2780](#))
- M. Limited Response of the Teamsters Local Union 560 and Joinder to Response of the International Brotherhood of Teamsters, to Debtors' Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objection to WARN Act Claims [Filed: 3/28/24] ([Docket No. 2781](#))
- N. WARN Representatives' Joinder in Support of Statement of the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee and International Association of Machinists and Aerospace Workers To Coughlen WARN Plaintiffs' Response to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability (D.I. 2896) [Filed: 4/9/24] ([Docket No. 2923](#))

Replies Received:

- A. Debtors' Reply in Support of Their Third Omnibus (Substantive), Fourth Omnibus (Substantive), and Fifth Omnibus (Substantive) Objections to Proofs of

Claim Alleging WARN Liability [Filed: 4/9/24] ([Docket No. 2909](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2578, Exhibit A](#))
- B. Declaration of Brian Whittman in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2579](#))
- C. Declaration of Cody Leung Kaldenberg in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2580](#))
- D. Declaration of Darren Hawkins in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2581](#))
- E. Declaration of Sarah Statlander in Support of Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability [Filed: 3/12/24] ([Docket No. 2582](#))
- F. Memorandum Opinion [Filed: 12/19/24] ([Docket No. 5227](#)) [Adv. Pro. 23-50457, [Docket No. 180](#)] [Adv. Pro. 23-50761, [Docket No. 143](#)]
- G. [Signed] Order Relating to the WARN Claims and Proceedings Pretrial Deadlines [Filed: 12/27/24] ([Docket No. 5280](#)) [Adv. Pro. 23-50457, [Docket No. 183](#)] [Adv. Pro. 23-50761, [Docket No. 145](#)]
- H. [Signed] Order Relating to Motions for Summary Judgment Filed in Connection With Warn Claims and Proceedings [Filed: 1/13/25] ([Docket No. 5390](#)) [Adv. Pro. 23-50457, [Docket No. 196](#)] [Adv. Pro. 23-50761, [Docket No. 154](#)]
- I. Unions' Exhibit List to be Offered at Trial [Filed: 1/13/25] ([Docket No. 5393](#))
- J. Certification of Counsel Submitting the Coughlen Plaintiffs' Contributions to Pretrial Order Relating to WARN Claims and Proceedings [Filed: 1/14/25] ([Docket No. 5403](#)) [Adv. Pro. 23-50761, [Docket No. 159](#)]
- K. [Filed Under Seal] Debtors' WARN Trial Brief [Filed: 1/14/25] (Docket No. 5404) [Adv. Pro. 23-50457, Docket No. 206] [Adv. Pro. 23-50761, Docket No. 160]
- L. International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, and International Association of Machinists and Aerospace Workers' Trial Brief [Filed: 1/14/25] ([Docket No. 5405](#))

M. [Filed Under Seal] Plaintiffs' Pretrial Brief [Filed: 1/14/25] [Adv. Pro. 23-50457, Docket No. 205]

Status: Trial will go forward on this matter.

Dated: January 21, 2025
Wilmington, Delaware

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
**PACHULSKI STANG ZIEHL &
JONES LLP**
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted pro hac vice)
David Seligman, P.C. (admitted pro hac vice)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: patrick.nash@kirkland.com
david.seligman@kirkland.com

-and-

Allyson B. Smith (admitted pro hac vice)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: allyson.smith@kirkland.com

*Co-Counsel for the Debtors and Debtors in
Possession*